



EIS001191

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February 3, 2000

RECEIVED

FEB 07 2000

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Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
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North Las Vegas, Nevada 89036-0307

Dear Ms. Dixon:

Below are the public comments of the Citizens Action Coalition of Indiana on the DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR A GEOLOGIC REPOSITORY FOR THE DISPOSAL OF SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE AT YUCCA MOUNTAIN, NYE COUNTY, NEVADA. The Citizens Action Coalition of Indiana (CAC) is a state-wide citizens organization with over 300,000 members throughout the state of Indiana.

The No Action Alternative

- 1... Neither of the No Action scenarios are reasonable alternatives to the Proposed Action.

Long-term storage at the current storage sites with effective institutional controls for at least 10,000 years is not a reasonable alternative since no one can predict whether or not the social infrastructure to guarantee effective institutional control will exist 10,000 years into the future.

Long-term storage at the current storage sites with no effective

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institutional controls beyond 100 years is not a reasonable alternative because the waste will remain deadly for at least 10,000 years.

The Draft EIS states that the inclusion of the No Action Alternative is to provide a baseline for comparison to the Proposed Action. *This makes no logical sense. If the alternative is not reasonable, then the comparison also is not reasonable, or of any substantive value.*

Transportation issues

- 2 [Based on the DOE web site, and on national highway routing regulations and available rail lines, it is clear that Indiana would be one of the states most affected, with shipments moving through every major population area of the state. This is in spite of the fact that Indiana has no nuclear power plants and, except for a few small research reactors at our universities, generates no high-level radioactive waste.
- 3 [At a conference on High-Level Radioactive Waste Transportation held at the University of Notre Dame in May of 1998, Local Emergency Preparedness Committee members reported that Indiana emergency responders are ill prepared or equipped to deal with any accident involving a radioactive release. *The Final EIS should include the state of preparedness of first responders as part of the analysis of conditions along each and every proposed route.*
- 4 [The Draft EIS does not identify and specifically analyze particular routes for rail and highway shipments. It needs to be recognized that regular shipments of high-level radioactive waste over a 24-year period will have a major impact on communities along transportation routes, even if an accident never actually occurs.]
- 5... [Low income and minority communities are often located adjacent to freeways and railroads, and much of the waste will pass through native American territory (including Yucca Mountain itself which, according to the Treaty of Ruby Valley, is

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5 cont. land that belongs to the Western Shoshone Nation). *The Final EIS should analyze specific conditions, impacts, and hazards along the actual routes that will be used, including impacts on property values and on minority communities that may be disproportionately impacted. The Draft EIS assertion that the Proposed Action would have no disproportionately adverse impact on minority or low-income populations is without basis, and especially ignores Nevada Native Americans' position to the contrary.*

Site considerations

6 The description of the Proposed Action does not represent the actual design of the repository, which is still evolving. *The Final EIS should be based on the actual design selected, including a comparison with reasonable alternatives that were considered and the reasons for their rejection.*

7 DOE's own data shows that Yucca Mountain will fail to contain the waste.

- The presence of water within the proposed repository that is of recent origin (less than 50 years) indicates that ground water is percolating through the mountain at a rate that violates the DOE's own standard for an acceptable repository site.

- At least 33 seismic faults lie close to, or within, the site. 621 earthquakes of magnitude 2.5 or greater have occurred within 50 miles of the site over the last 20 years, including a 5.6 level quake centered just 12 miles from the site in 1992. A magnitude 5 or 6 earthquake at the site could dramatically raise the water table beneath the repository, flooding the chamber and leading to a corrosive breakdown of the disposal canisters and a possible steam explosion, thereby releasing plutonium and other waste products into the air and ground water.

8... Because Yucca Mountain cannot be relied on to isolate the waste, DOE has come to rely on engineered barriers for containment. This violates the legislative mandate for the program, not to mention

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- 8 cont. the whole rationale for geologic isolation, which is that the mountain will continue to contain the waste even after the first canisters begin to fail.
- 9 The EIS designates development of Yucca Mountain as the preferred alternative (in fact, the only "alternative") before there has been a formal determination of site suitability. In addition, many of the most important tests or research projects will not be completed until after the scheduled dates for the site recommendation to the President and the submission of the license application. This could lead some to conclude that the entire process is disingenuous.
- 10 In conclusion, it is the view of CAC that the Draft EIS is inaccurate and inadequate and a new one needs to be written.

Submitted by Roger Voelker, staff member,
Citizens Action Coalition of Indiana

